

STATE OF TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION DIVISION OF WATER RESOURCES COOKEVILLE ENVIRONMENTAL FIELD OFFICE

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April 23, 2014

Honorable Chris Thompson, Mayor City of Byrdstown P.O. Box 325 Byrdstown, TN 38549

RE: Sludge Application Site Approvals in Pickett County, Class B Biosolids, City of Byrdstown Sewer Treatment Plant (STP) Permit # TN0062626

Dear Mayor Thompson,

In response to a request from Byrdstown STP Operators, the Division of Water Resources (DWR) conducted two site reviews within Pickett County regarding the application of biosolids from the City of Byrdstown STP. On April 4, 2014, Mr. Dennis South and Jack Huddleston helpfully escorted DWR staff to the following sites:

Pendergrass Farm: "Clark Mtn. site": Latitude: 36.563447 and Longitude: - 85.12801

Pendergrass Farm: "Pendergrass Mtn. site": Latitude: 36.562360 and Longitude: - 85.155950

The above listed sites are currently in hay production. Mr. South stated that the sites are expected to stay in hay production. The sites are within rolling hills and require care with regard to setbacks from enclosed depressions. Waters of the State of Tennessee are not in close proximity to the sites. Neighbors are currently in close proximity to the Clark Mtn. Site therefore care should be taken with regard to maintaining property line setbacks. The above listed sites are considered good choices for biosolids application. The agronomic loading rate was calculated by Byrdstown personnel to be 3.4 tons per acre. The proposal for beneficial application of biosolids and associated agronomic loading rates for the above sites have been reviewed and are approved by the Cookeville Environmental Field Office Division of Water Resources.

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Please review the following items: Site Application Guidelines

Five year site approvals are contingent on all applicable State and Federal rules and regulations being met. All fields will need to be flagged prior to the application of biosolids to insure the necessary setbacks. Approval is subject to the following Class B site restrictions. Failure to comply with these restrictions will result in the revocation of the approval.

- Public access to the site shall be restricted for a minimum of thirty (30) days after biosolids application is made.
- Livestock shall not be permitted to graze on the site for a minimum of thirty (30) days after biosolids application is made.
- Hay or silage for animal feed shall not be harvested for a minimum of thirty (30) days after biosolids application is made.
- Food crops with harvested parts that touch the biosolids/soil mixture and are totally above the land surface shall not be harvested for fourteen (14) months after application is made.
- Food crops with harvested parts that are below the surface of the land shall not be harvested for twenty (20) months after application is made if four (4) months pass prior to the biosolids being incorporated into the soil.
- Food crops with harvested parts that are below the surface of the land shall not be harvested for thirty eight (38) months after application is made if less than four (4) months pass prior to the biosolids being incorporated into the soil.
- The biosolids shall not be applied if the site is flooded, frozen or during a precipitation event.
- The biosolids shall not be applied within 100 feet of a well serving a house.
- The biosolids application shall not be made within 100 feet of an active sinkhole.
- Biosolids shall not be applied within 100 feet of surface waters of the State of Tennessee where the application is up gradient (above) from the surface water.
- Biosolids shall not be applied within 33 feet of surface waters of the State of Tennessee where the application is down gradient (below) from the surface water.

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- The biosolids application must comply with any local zoning ordinances.
- The Division reserves the right to require incorporation of the biosolids if odor complaints are received. If odor complaints continue, the approval will be revoked.

Records of the amount of biosolids applied to each site, along with documentation of the method used for pathogen and vector attraction reduction must be maintained and included in the annual report submitted by February 15th of each year.

Thank you and wastewater personnel, Dennis South and Jack Huddleston, for your time and courtesy. If you have any questions, you may contact Oakley Hall in Cookeville via telephone at (931) 432-7635 or toll free at 1-(800) 891-8332. You may also use electronic mail at Oakley.Hall@tn.gov

Respectfully,

Johnny K. Walker

John K. Wall

Environmental Program Manager

Division of Water Resources

Cookeville Environmental Field Office

Cc: Robert Odette – Division of Water Resources, Nashville Central Office